

DEFENDANTS' OBJECTIONS TO PARALEGAL FEES

Date of Service	Paralegal / page # / Line #	Description	Hours	Basis for objection
10/9/2015	Hamilton 1/1	Email from TH opening file	0.1	Appearance wasn't filed for TH until 1/20/2016
10/12/2015	Hamilton 1/ 2	Create trial file	0.3	Appearance wasn't filed for TH until 1/20/2016
7/25/2017	Hamilton 1/ 5	Review email	0.1	Vague, excessive, unnecessary
9/9/2013	Means 1/ 4, 6	Telephone calls to Lecharn Lewis and Shawn Smith	0.3	Clients in separate case settled by counsel with each side bearing their own costs and fees
1/31/2014	Means 2/8	Draft FOIA request to OEMC	0.5	Discovery violation as materials never produced; duplicative of hours billed by attorneys
2/14/2014	Means 2/10	Send FOIA request to OEMC	0.4	Discovery violation as materials never produced; duplicative of hours billed by attorneys
5/22/2013	Kaliski 2/9, 10	Telephone calls	0.2	Vague, unnecessary, excessive
6/12/2013	Kaliski 2/34	Draft and send FOIA to Chicago Police Department	0.5	Discovery violation as materials never produced
6/13/2013	Kaliski 2/35	Draft and send FOIA to LAPD	0.3	Discovery violation as materials never produced; duplicative of hours billed by attorneys
6/20/2013	Kaliski 2/41	Draft and send FOIA to OEMC	0.3	Discovery violation as materials never produced; duplicative of hours billed by attorneys
7/1/2013	Kaliski 3/8	Telephone conference with Shawn Smith	0.1	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition
7/1/2013	Kaliski 3/9	Telephone conference with Lecharn Lewis	0.1	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of

				defense to serve him for his deposition
7/26/2013	Kaliski 3/36	Telephone conference with CPD Sgt.	0.2	Vague, unnecessary
7/26/2013	Kaliski 3/37	Fax to ERPS	0.1	Vague, unnecessary
7/26/2013	Kaliski 3/38	Review documents from IPRA	1.3	Vague
7/29/2013	Kaliski 3/ 40	Schedule visit to ERPS	0.3	Vague
8/23/2013	Kaliski 4/24	Telephone conference with Shawn Smith	0.1	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition
8/23/2013	Kaliski 4/25	Telephone conference with Lecharn Lewis	0.1	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition
8/27/2013	Kaliski 4/29	Telephone conference with Lecharn Lewis	0.1	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition
8/29/2013	Kaliski 4/32	Locate settlement paperwork for Pleas case	0.4	Unrelated to the prosecution of this lawsuit; unnecessary
9/16/2013 9/17/2013 9/18/2013 9/19/2013 9/23/2013	Kaliski 4/36 – 37, 39, 41, 46	Telephone calls with Lecharn Lewis and family	0.5	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition
9/23/2013	Kaliski 4/45	Telephone call with Shawn Smith	0.1	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition

9/23/2013 9/24/2013	Kaliski 5/1, 15	Emails and meeting with Lecharn Lewis	0.2	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition
9/24/2013 10/17/2013	Kaliski 5/ 9, 29	Phone calls with Shawn Smith	0.2	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition
9/24/2013	Kaliski 5/11	Review documents regarding Keith Thornton	0.3	Vague; duplicative of attorney billing entries
10/21/2013	Kaliski 5 / 36	Redact employment records for defendants	0.8	Vague entry
11/1/2013	Kaliski 5/37	Draft and send letter to LAPD	0.5	Vague; documents never produced in discovery
11/4/2013	Kaliski 5/38	Conference with Tyrone Jones	0.1	Witness was previously represented by counsel; witness was subject of multiple motions due to inability of defense to serve him for his deposition
11/19/2013	Kaliski 5/42	Prepare Google maps	1.8	Duplicative of attorney billing entries
2/13/2014	Kaliski 6/26	Review FOIA request results	0.8	Documents never produced in discovery
10/9/2015	Kaliski 7/23	Draft FOIA request to LAPD	0.5	Documents never produced in discovery; duplicative of attorney billing entries
10/13/2015	Kaliski 7/25	Draft motion to add appearance of Torreya Hamilton	0.3	Duplicative billing